FILED
DEC - 7 2016
U.S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
v.) No.
)
DEJUAN WINGARD,) 4:16CR522 AGF/PLC
MARIO WASHINGTON,)
JACOB LEE,)
DERRICK CROWDER,)
DARIUS BOWDRY,)
TERRENCE BELL,)
JULIAN CAMPBELL,)
KEYSHYALA THOMAS,)
)
Defendants.)

INDICTMENT

COUNT I

The Grand Jury charges that:

On or about November 26, 2016, in St. Louis County within the Eastern District of Missouri and elsewhere,

DEJUAN WINGARD,
MARIO WASHINGTON,
JACOB LEE,
DERRICK CROWDER,
DARIUS BOWDRY,
TERRENCE BELL,
JULIAN CAMPBELL,
KEYSHYALA THOMAS,

the Defendants herein, did knowingly and intentionally transport, transmit and transfer stolen merchandise of a value of $5,000 or more from the State of Missouri to the State of Illinois.

In violation of Title 18, United States Code Section 2314 and 2.

FORFEITURE ALLEGATION

The United States Attorney further finds by probable cause that:

1. Pursuant to Title 18, United States Code, Sections 981(a) and Title 28, United

States Code, Section 2461(c), upon conviction of an offense in violation of Title 18, United States Code, Section 2314 as set forth in Count I, the defendants shall forfeit to the United States of America any property, real or personal, constituting or derived from any proceeds traceable to such violation(s).

2. Subject to forfeiture is a sum of money equal to the total value of any property, real or personal, constituting or derived from any proceeds traceable to such violation(s).

3. Specific property subject to forfeiture includes, but is not limited to, the following:

a) Chanel Handbag; SKU: #3572636321479, Color: Red, Style: Red Coco Curve, Authenticity #23129551;

b) Chanel Handbag, Color: Neon Orange, Style: Patent Bag Orange Mini, Authenticity #21965445;

c) Chanel Handbag, Color: Neon Orange, Style: Patent Bag Orange Mini, Authenticity#21965450;

d) Chanel Handbag, SKU: 3572637289280, Color: Navy Blue, Style: Navy Bucket, Authenticity #23529023;

e) Chanel Handbag, SKU: 3572637626276, Color: Black, Authenticity #23482393;

f) Chanel Handbag, SKU: 3572635035681, Color: Neon Blue, Style: Blue Patent Boy, Authenticity #21946770;

g) Chanel Handbag, SKU: 3572635872453, Color: Pink, Style: Pink Chevron, Authenticity #22070146;

h) Chanel Handbag, SKU #3572637293365, Color: Navy Blue, Style: Navy Boy, Authenticity #23385532;

i) Chanel Handbag, SKU: 3572637621417, Color: Blue, Style: Jumbo

Classic, Authenticity #23599795;

j) Chanel, SKU: 3572632133199, Color: Maroon, Style: Wallet, Authenticity #19660520;

k) Chanel, SKU: 3572632133199, Color: Maroon, Style: Wallet, Authenticity #19660493;

l) Chanel Handbag, SKU: 3572637625187, Color: Blue/Ivory, Style: Mini-Boy, Authenticity #23562542;

m) Chanel Handbag, SKU: 3572637038451, Color: Red, Authenticity #23240035;

n) Chanel Handbag, SKU: 3572637292389, Color: Pink, Style: Pink Boy, Authenticity #23387315;

o) Chanel Handbag, SKU: 35726376252930, Color: Pink/Ivory, Style: Small Boy, Authenticity #23557803;

p) Givenchy Handbag, SKU: 3594655628247, Color: Night Blue;

q) Chanel Handbag, SKU: 3572635939231, Color: Black, Style: Chevron-Bucket Urban Spirit;

r) Chanel Handbag, Color: Pink, Style: Pale Pink Mini;

s) Chanel Handbag, SKU: 3572635520422, Color: Blue, Style: Denim Classic;

t) Chanel Handbag, SKU: 3572635872552, Color: Black, Style: Black Chevron Med Mag;

u) Chanel Handbag, SKU: 3572635872552, Color: Black, Style: Black Chevron Med Mag;

v) Chanel Handbag, SKU: 3572637289020, Color: Red, Style: Red Mini Bucket, Authenticity #23395103;

w) Chanel Handbag, SKU: 3572637289020, Color: Red, Style: Red Mini Bucket, Authenticity #23395767;

x) Chanel Handbag, SKU: 3572637289051, Color: Black, Style: Black Mini Bucket;

y) Chanel Handbag, SKU: 3572637625187, Color: Red, Style: Jumbo Classic, Authenticity #23599795;

z) Chanel Handbag, SKU: 3572637292372, Color: Fuchsia Pink, Style: Small Boy, Authenticity #23321976;

aa) Chanel Handbag, SKU: 3572637239353, Color: Black, Style: CC Trendy;

bb) Chanel Handbag, SKU: 3572637241035, Color: Black, Style: Tote Bus Affinito;

cc) Chanel Handbag, SKU: 3572637530245, Color: Coral, Style: Natural Coral Mini, Authenticity #23555161; and

dd) Chanel Handbag, SKU: 3572367626252, Color: Khaki/Brown, Style: Khaki Tote, Authenticity #23579069.

4. If any of the property described above, as a result of any act or omission of the defendant(s):

a. cannot be located upon the exercise of due diligence;

b. has been transferred or sold to, or deposited with, a third party;

c. has been placed beyond the jurisdiction of the court;

d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be divided without difficulty,

the United States of America will be entitled to the forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

A TRUE BILL.

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FOREPERSON

RICHARD G. CALLAHAN
United States Attorney

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Thomas C. Albus, #46224MO
Assistant United States Attorney